



RICARDO SOLANO JR.
rsolano@fklaw.com
973.877.6421

March 21, 2016

BY ELECTRONIC FILING

Hon. William H. Walls, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *GeneDx, Inc. & Bio-Reference Labs., Inc. v. Invitae Corp.*,
2:15-cv-06869-WHW-CLW

Dear Judge Walls:

This firm represents plaintiffs GeneDx, Inc. and Bio-Reference Laboratories, Inc. in the above-referenced action. We are writing to respectfully request an additional forty-five-day extension of time for plaintiffs to submit opposition papers to defendant's motion to dismiss the amended complaint pursuant to Fed. R. Civ. P. 12(b)(2), and an additional forty-five-day extension of time for defendant to file its reply papers, if any. Defendant, through counsel, has consented to this request for extension.

Plaintiffs and Defendant are in the process of negotiating a stipulation that would provide for the exchange of certain jurisdictional discovery related to defendant's motion and plaintiffs' opposition to it. Plaintiffs respectfully request the additional time to afford the parties the opportunity to finalize their agreement, to exchange the discovery, and thereafter to meaningfully review the discovery before submitting any further briefing. If the parties reach this agreement, it will eliminate the need for discovery-related motion practice. The parties have already reached agreement on a proposed discovery confidentiality order that was submitted to the Honorable Cathy L. Waldor on Friday, March 18, 2016, thereby avoiding the need for motion practice on that issue.

The motion to dismiss the amended complaint was filed and served on December 14, 2015, with an original return date of January 19, 2016. On December 30, 2015, plaintiffs obtained an automatic extension of time pursuant to L. Civ. R. 7.1(d)(5). On January 19, 2016, and on February 18, 2016, plaintiffs obtained two, separate thirty-day extensions of time with the consent of defendant to afford the parties the opportunity to try to reach agreement on the jurisdictional discovery. As a result, plaintiffs' opposition papers are currently due today, March 21, 2016, and the return date for the motion is May 2, 2016. If

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this request is granted, plaintiffs' opposition papers would be due May 5, 2016; defendant's reply papers, if any, would be due June 20, 2016; and the new return date for the motion would be July 5, 2016.

Thank you for your attention to this matter. For the Court's convenience, if this request meets with your approval, I have included a "So Ordered" signature line below. If Your Honor would prefer a formal proposed order setting forth the briefing schedule, please let me know and we will submit one immediately.

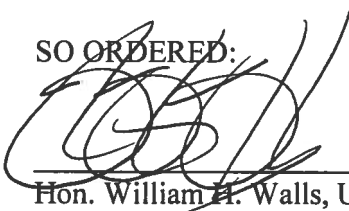
Respectfully submitted,

s/ Ricardo Solano Jr.

Ricardo Solano Jr.

cc: All Counsel via ECF

SO ORDERED:



Hon. William H. Walls, U.S.D.J.

DATED: March 22, 2016